

**REMARKS/ARGUMENTS**

Claims 1-28 are pending. By this Amendment, claims 27 and 28 have been amended. Reconsideration in view of the above amendments and the following remarks are respectfully requested.

At the outset, Applicant respectfully submits that the finality of the Office Action has been made prematurely for reasons discussed below. Accordingly, Applicant respectfully requests that the finality of the Office Action be withdrawn, and that the amendments to claims 27 and 28 herein be entered as a matter of right.

Claim 28 was rejected under 35 U.S.C. §102(b) over Dubuit (U.S. Patent No. 6,397,740). This rejection is respectfully traversed.

Claim 1 is directed to a station for applying one or more substances to a substrate, of the type comprising at least one mobile printing bridge. The station comprises means to install and means to control the mobile printing bridge to transform it from the screen printing station to a digital printing station, or vice versa. As such, claim 1 is cast in classic “means-plus-function” (MPF) format, thus invoking 35 U.S.C. §112, sixth paragraph. Based on MPEP §§2182-2183, the Examiner is required to interpret an MPF limitation consistent with the specification, and to apply two-step analysis in considering such MPF limitations: 1) that define the particular function of the limitation, and 2) identify the corresponding structure for that function. In the present case, the Examiner has failed to establish a *prima facie* case for rejecting the MPF claim limitations recited in claim 1. For example, the specification, in the section titled “Modes for Carrying out the Invention”, provides various structure for installing and controlling the mobile printing bridge to transform it from a screen printing station to a digital printing station, or vice versa, as set forth in claim 1. For example, station 10 in Figure 1 includes supports 11 which are

movable on a frame 15. Stated differently, the mobile station includes elements of the station which are in common between the screen printing station, which may include a doctor/doctor system or a doctor/scrapper system, and the digital printing station, in which a digital printing assembly may be employed. Moreover, the frame 15 and the movable supports 11 are commonly used in both the screen printing mode and the digital printing mode.

Dubuit fails to teach or suggest this subject matter. Dubuit has screen printing stations 14 and at least one ink jet printing station 15. Dubuit does not teach any conversion of the same printing station by replacing the printing bridge 27 with a doctor blade for silk-screen printing station, but only to place in the operating position a digital printing station 15 when required.

Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 1-15, 17, 18 and 27 were rejected under 35 U.S.C. §103(a) over Dubuit in view of Rodi (U.S. Patent No. 6,019,046). This rejection is respectfully traversed.

Rodi teaches only to substitute a whole printing station (“printing unit”) in a position (which is referred to as a station) made available on the machine. Rodi does not suggest any reason for modifying the machine of Dubuit in order to arrive at a convertible station.

Rodi teaches that any kind of printing units 4a-4e and any kind of “aggregate units” 9a-9c can be mounted indifferently in each of the positions of the printing machine. This is clear evidence of the fact that these units have a different structure to one another and therefore Rodi does not teach to replace a single component (such as a printing bridge) of a first unit in a second unit to change the printing mode of the second unit (e.g., from the printing mode made available by unit 4a to the printing mode of the units 4b-4e).

Stated differently, according to Rodi, it is not suggested to replace the printing bridge but the whole station must be replaced in order to change the printing mode in each position of the

printing machine. Confirmation of the different structure among the units can be found in column 3, lines 21-25, where it is clearly stated that offset and gravure printing units have rotating cylinders to be controlled while electro photographic and ink jet printing units do not have rotating cylinders to be controlled.

Therefore, Rodi at best teaches to replace entirely one or more screen printing stations 14 with one or more corresponding ink jet printing stations 15, or vice versa, of Dubuit. There are no means to transform the mobile printing bridge from a screen printing station to a digital station, or vice versa, per claim 1.

Further, the combination of Dubuit and Rodi does not teach or suggest the subject matter of claim 27, in which the mobile printing bridge includes at least one common frame having at least one common movable support for using both the digital mode and the silk-screen mode. Similarly, the Rodi/Dubuit combination does not teach or suggest the machine of claim 28, in which the at least one station includes at least one common movable support to support both a doctor/scrapper assembly when in the screen printing mode and a digital printing assembly when in the digital printing mode. Neither Dubuit nor Rodi teaches or suggests the use of common support structure in both the digital mode and the silk-screen mode.

Reconsideration and withdrawal of the rejection are respectfully requested.

In view of the above amendments and remarks, Applicant respectfully submits that all the claims are patentable and that the entire application is in condition for allowance.

The Commissioner is hereby authorized to charge any deficiency, or credit any overpayment, in the fee(s) filed, or asserted to be filed, or which should have been filed herewith (or with any paper hereafter filed in this application by this firm) to our Account No. 14-1140 under Order No. PTB-3687-99.

MANOUKIAN  
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Should the Examiner believe that anything further is desirable to place the application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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